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November 17, 2000

Sent via e-mail and either hand-delivery or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Verizon's Tariff No. 17, D.T.E. 98-57 - Phase I

Dear Secretary Cottrell:

Enclosed for filing in the above-referenced matter please find the Attorney General's First Set of Information Requests for Verizon-Massachusetts.

If you have any questions please do not hesitate to call.

Sincerely,

Karlen J. Reed
Assistant Attorney General
Regulated Industries Division
200 Portland Street, 4th Floor
Boston, MA 02114

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617-727-2200

KJR/kr

Enc.

cc: Tina Chin, Hearing Officer (w/enc.)

D.T.E. 98-57-Phase I Service List (w/enc.)

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion as to)
the propriety of the rates and charges set forth in the)
following tariffs: M.D.T.E. No. 17, filed with the) D.T.E. 98-57 - Phase I
Department on October 5, 2000, by Verizon New England,)
Inc. d/b/a Verizon Massachusetts.)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary of the Department by e-mail and/or by either hand-delivery or U.S. mail.

Dated at Boston this 17th day of November 2000.

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Karl en J. Reed
Assistant Attorney General
Regulated Industries Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200

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THE ATTORNEY GENERAL'S

INSTRUCTIONS FOR RESPONDING TO

INFORMATION REQUESTS

1. These Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England, Inc., d/b/a Verizon-Massachusetts ("Verizon" or "the Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice,

testimony or other services in connection with this proceeding.

2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If an Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.

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9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.

10. If, in answering any of these Information Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.

11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

14. Each request for information includes a request for all documentation which supports the response provided.

15. Please provide one copy of each response.

16. The term "Company" refers to the Company that the data and information requests are directed to. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, agents, and legal counsel.

17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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THE ATTORNEY GENERAL'S

FIRST SET OF INFORMATION REQUESTS

FOR VERIZON-MASSACHUSETTS

AG-VZ-1-1 Referencing page 6 of Verizon's November 13, 2000, Direct Testimony, how can a CLEC, after vacating an adjacent structure, restore the land "to its original condition" if creating the adjacent structure involved earth removal or disturbance? What standards will Verizon use to determine whether the land has been restored to its "original" condition?

AG-VZ-1-2 Please refer to pages 6-7 (including footnote 1) of Verizon's Direct Testimony. Will Verizon's costs for on-site adjacent collocation, as well as any other costs or cost studies described in Verizon's Direct Testimony, be affected by the Department's reviews in 2001 of Verizon's unbundled network elements ("UNE") recurring charges or Verizon's new Price Cap Plan? If so, will Verizon file revised tariff pages to reflect those changes?

AG-VZ-1-3 Please refer to pages 13 and 14 of Verizon's Direct Testimony. How far, in

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terms of feet or meters, does Verizon define as "a standard city block" in relation to Verizon's Adjacent Off-Site Arrangement ("AOSA")?

AG-VZ-1-4 In its Direct Testimony at pages 31 and 34, Verizon states that it seeks permission to use individual case basis ("ICB") pricing under M.D.T.E. Tariff No. 17 for its Telecommunications Carrier Outside Plan Interconnection Cabinet ("TOPIC") interconnection activities and for several Collocation at Remote Terminal Equipment Enclosures ("CRTEE") related activities, due to its lack of actual experience in provisioning these offerings. How much experience does Verizon need to standardize these rates? Will four requests (the same number Verizon used to calculate its charges for converting Special Access services to EELs, per Verizon's Direct Testimony at pages 45-46) suffice?

November 17, 2000